

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

LENZIE GILL,)
)
Plaintiff,)
)
vs.) Civil Action No.: 2:06cv1151-MHT
)
PROGRESSIVE DIRECT)
INSURANCE COMPANY,)
)
Defendant.)

PLAINTIFF'S STATEMENT IN OPPOSITION TO DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT

COMES NOW the Plaintiff, Lenzie Gill, by and through his undersigned counsel, and files his Statement in Opposition to Defendant's Motion for Summary Judgment, and say's as follows:

As grounds for the denial of Defendant's motion, Plaintiff adopts and incorporates by reference the content of his filings entitled:

- a) Plaintiff's Motion for Partial Summary Judgment as to Liability and Partial Damages (Doc. 6); &
- b) Plaintiff's Reply to Opposition to Plaintiff's Motion for Partial Summary Judgment by Defendant, Progressive Direct Insurance Company (Doc. 20).

WHEREFORE Plaintiff requests that the Court deny Defendant's Motion for Summary Judgment, for the reasons set forth herein.

/s/ Jerry M. Blevins
JERRY M. BLEVINS (BLE003)
Attorney for Plaintiff

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of June, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following parties or counsel:

R. Larry Bradford, Esq.
Shane T. Sears, Esq.
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/s/ Jerry M. Blevins
Jerry M. Blevins